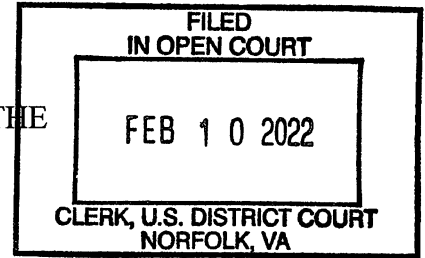


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division



UNITED STATES OF AMERICA

v.

STEVE M. COCHRAN

Defendant.

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CRIMINAL NO. 4:22-cr-7

STATEMENT OF FACTS

By signing below, the parties stipulate that the following facts are true and correct, and that had the matter gone to trial, the United States of America would have proven them beyond a reasonable doubt, by competent and admissible evidence.

1. At all times relevant, STEVE M. COCHRAN, the defendant herein, was a resident of Newport News, Virginia, in the Eastern District of Virginia.

2. Between in or about January 2021 and in or about September 2021, the defendant made more than 60 threats of violence – including to murder, kidnap, torture, and rape – to state and federal politicians across the United States.

Count 1 – Interstate Communications with Threats to Injure GOVERNOR 1

3. On March 17, 2021, the defendant sent an e-mail directly to GOVERNOR 1 threatening to kill GOVERNOR 1:

You're a FA* INCEST BABY !! YOUR DEATH IS COMING SOON MORON
PU*** WORTHLESS PIECE OF SH**.

4. On June 24, 2021, the defendant sent an e-mail to the Communications Office for GOVERNOR 1 threatening to kill GOVERNOR 1 and his family:

[GOVERNOR 1] will not live past August !!!! No threat it's a GUARANTEEE
and PROMISE !! His wife and kids are in imminent danger.

KLK SC
Dmc

5. On August 6, 2021, the defendant directly e-mailed GOVERNOR 1 and again threatened to kill GOVERNOR 1 and his family:

[GOVERNOR 1] IS A FAKE FRAUD THAT WILL BE KILLED AND FAMILY SLAIN

6. On or about August 7, 2021, the defendant sent three separate emails directly to GOVERNOR 1 with the following threats:

Your a STUPID MOTHERFU**** HOPE YOU DIE YOU DUMB FU** HOPE SOMEBODY SHOOTS YOU IN THE FACE YOU DISGUSTING PIECE OF SH**

[GOVERNOR 1] IS A DEAD MAN WALKING FA**** BI***

Your family is in imminent danger your gonna watch your mother and wofe get raped and slaughtered then blow your fu***** brains out you WORTHLESS disgusting SCUMBAG

7. On or about August 10, 2021, the defendant sent four emails to GOVERNOR 1 and his Communication Office with the following threats:

Your a DEADMAN we will assassinate you

You will Die U fa**** bi***

You and your family will die since you wanna kill people it's time to KILL YOU AND ANYBODY RELATED TO YOU FU***** MORON MURDERER

[GOVERNOR 1] will be ASSASSINATED !!! He wants to kill kids he's gonna get killed and his family tortured to death !!! Your a DEADMAN [GOVERNOR 1]

8. The defendant used the email address painterboy7906@gmail.com to make the foregoing threats to GOVERNOR 1. The defendant is the registered subscriber for this e-mail account with Google.

9. The defendant's e-mail threats to GOVERNOR 1 resulted in electronic transfers of information to occur between locations in the Eastern District of Virginia and terminals and/or computer servers outside of the Commonwealth of Virginia.

10. The defendant's threats to GOVERNOR 1 were made the purpose of issuing a threat and with knowledge that the communication would be viewed as such. The defendant agrees that a reasonable person would have understood his threats as an expression of an intention to do harm.

11. On or about August 19, 2021, law enforcement officers contacted the defendant about his threats to GOVERNOR 1. He initially lied and claimed that he was not the person making the threats to GOVERNOR 1. He later called investigators a second time and confessed. The defendant stopped making threats to GOVERNOR 1, but he continued to threaten other state and federal politicians in a similar manner.

Count 2 – Influencing, Impeding, and Retaliating Against a Federal Official by Threat

12. Between or about June 12, 2021, and on or about June 26, 2021, the defendant made the following threats to U.S. SENATOR 1 by e-mail.

You and your family aren't going to live much longer butcher your head off and do like Ted Bundy and put your head on a stick and stick it on a hillside

Your a FU***** CLOWN !! You say the dumbest shit you puny little pu*** !!!!
You need your head smashed in your a low life no good piece of shit go shoot yourself fa*****

Eat shit you PU*** .. cant wait till you get LEAD 2 THE HEAD

LEAD 2 THE HEAD .. BOOM BOOM ... YOUR DEAD!

WEAK PU*** YOU NEED TO BE HANGING FROM A TREE LIKE A CHRISTMAS ORNAMENT

13. The defendant used the email address painterboy7906@gmail.com to make the foregoing threats to U.S. SENATOR 1. The defendant is the registered subscriber for this e-mail account with Google.

14. U.S. SENATOR 1 is a federal official because he is a Member of Congress.

15. The defendant's threats to U.S. SENATOR 1 were made with intent to impede, intimidate, and interfere with U.S. SENATOR 1 while he was engaged in the performance of his official duties as a Member of Congress.

16. The defendant made threats to U.S. SENATOR 1 and other state and federal politicians because the defendant disagreed with their political decisions. For example, in a representative threat to another member of Congress (U.S. SENATOR 2), the defendant explained his motivation:

You better watch yourself every single day !!! We have sworn to take you out before summer is over your life will be over you disgusting fa**** you need to be shot in your mouth with a double barreled shotgun and completely blow your fucking brains out take some of your brain matter and send it to all your family members and your lying piece of shit Retrumplicans so they see what there future looks like. This is no threat it's a GUARANTEE that we are going to do everything we possibly can to end your miserable lying stupid looking ass and i put my hand on the bible we will devote all are time to put you in the dirt that's the best place for you to be you PU***, WEAK BI*** YOUR A DEADMAN MORHERFUCKER !!! AMERICANS HATE YOU WITH A PASSION AND FOR OFFICER SICKNICK'S MOTHER AND WIFE FOR THE THINGS YOU HAVE BEEN SAYING EVEN AFTER MEETING WITH OFFICE FANONE AND HE TOLD YOU WERE A PIECE OF SH** YOU'RE A** WILL DIE SOON BI***

17. The defendant's foregoing threats to U.S. SENATOR 1 were made the purpose of issuing a threat and with knowledge that the communication would be viewed as such. The defendant agrees that a reasonable person would have understood his threats as an expression of an intention to do harm.

Relevant Conduct – Representative Examples of Other True Threats

18. Between in or about January 2021 and in or about September 2021, the defendant made other similar threats to murder, kidnap, torture, and rape state and federal politicians across the United States.

19. On January 3, 2021, the defendant emailed U.S. SENATOR 3 and threatened to kill him.

DEADMAN WALKING . . . ONE SHOT STRAIGHT TO THE HEAD AND
YOUR DEAD PU***!!! YOUR FAMILY BETTER WATCH THERE BACKS
CAUSE BOOM BOOM OFF WITH THERE HEADS YOU FU***** SCUMBAG
SMUCK

20. On January 3, 2021, the defendant emailed U.S. SENATOR 4 and threatened to kill him and his family.

YOU AND YOUR FAMILY BETTER WATCH YOUR BACKS AT ALL TIMES
CAUSE TRUST AND BELIEVE SILENCER AND YOUR A** IS SIX FEET
DEEP WHERE YOU BELONG HOU DISGRACEFUL BI***

21. On January 6, 2021, the defendant emailed U.S. SENATOR 2 and threatened to kill him.

Your a deadman as soon as your seen in public your gonna feel hot led in you to
end you and your disgusting fu***** face you disgraceful piece of sh*** scumbag
c** sucker

22. On January 7, 2021, the defendant emailed U.S. SENATOR 5 and threatened to kill him and his family.

[U.S. SENATOR 5] prepare to DIE PU*** !!! YOUR GONNA SEE WHAT IT
FEELS LIKE TO BE SHOT AND SUFFER YOUR A BI*** AND WERE GOING
TO SLAUGHTER YOU AND YOUR FAMILY WE KNOW WHERE YOU LIVE
AND YOUR FAMIY SO ITS TIME OF RECKONING FOR YOU YOU FU*****
SCUMBAG. WERE GONNA MURDER YOU ON LIFE TV THATS ON THE
BIBLE YOU WILL DIE YOU FU***** PUNK YOU DESERVE TO DIE AND
YOU WILL DIE COWARD

23. On May 8, 2021, and May 24, 2021, the defendant emailed U.S.

REPRESENTATIVE 1 and threatened to kill her.

Fu** you cu** you and your boy are gonna be dead meat soon you cu** nasty cu**
bucket trailer park TRASH

Your gonna die sl** death is at your front door cu** bag

24. On June 4, 2021, the defendant emailed a former President of the United States
and threatened to kill him.

Reagan lived but you won't You heard of John Hinkley ?!?!? WELL THERE'S
GONNA BE A NEW JOHN HINKLEY ONLY DIFFERENCE IS RONALD
REAGAN SURVIVED BUT YOU WILL NOT ! ! ! SO PLACE DO THESE
RALLIES IT'S GONNA BE EASY TO BLAST YOUR UGLY PU*** A**
DEADMAN WALKING ! ! ! ! DEADMAN WALKING ! ! ! ! DEADMAN
WALKING ! ! ! !

25. On July 1, 2021, the defendant emailed U.S. REPRESENTATIVE 2 and
threatened to kill him.

DEADMAN WALKING DEADMAN WALKING DEADMAN WALKING
TRUMP'S DI** HOLDER TRUMP'S DI** HOLDER TRUMP'S DI** HOLDER
YOUR LIFE IS OVER YOUR LIFE IS OVER YOUR LIFE IS OVER THIS IS
NO THREAT IT'S A PROMISE !!!!

26. On July 15, 2021, the defendant emailed U.S. REPRESENTATIVE 1 and
threatened to kill her.

Your a DEAD cu** say goodbye to your family cu** be prepared to go out like the
Haitian president

27. On August 14, 2021, and September 1, 2021, the defendant emailed U.S.
REPRESENTATIVE 3 and threatened to kill him.

Watch out for the red dot that pops up on your face you fa*****

Please come to Va. where you are HATED and YOUR DIRT on the bottom of
shoes and shit on pu***** like you, you talk tough but you're a BI*****

* * *

28. The defendant stipulates and agrees that he committed the acts described herein unlawfully, knowingly, and willfully, and without legal justification or excuse with the specific intent to do that which the law forbids, and not by mistake, accident or any other reason. The defendant further acknowledges that the foregoing statement of facts does not describe all of his conduct relating to the offenses charged in this case, nor does it identify all of the persons with whom he may have engaged in illegal activities.

Respectfully Submitted,

Jessica D. Aber
United States Attorney

By:



D. Mack Coleman
Assistant United States Attorney

KCK
SC
JMC

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States could prove these facts beyond a reasonable doubt.



STEVE M. COCHRAN
Defendant

I am counsel for STEVE M. COCHRAN. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Keith L. Kimball
Defense Counsel